



STATE OF DELAWARE  
DEPARTMENT OF NATURAL RESOURCES  
& ENVIRONMENTAL CONTROL  
DIVISION OF WASTE AND HAZARDOUS SUBSTANCES  
391 LUKENS DRIVE  
NEW CASTLE, DELAWARE 19720-2774

SITE INVESTIGATION &  
RESTORATION SECTION

TELEPHONE: (302) 395 - 2600  
FAX NO.: (302) 395 - 2601

November 2, 2016

Steve Baggett  
Stantec Consulting Corporation  
1060 Andrew Drive, Suite 140  
West Chester, PA 19380

**RE: Comments to Draft Remedial Investigation Work Plan  
12<sup>th</sup> St. Drum Site Portion of Amtrak Former Fueling Facility (DE-0266)  
Wilmington, Delaware**

Dear Mr. Baggett:

The Department of Natural Resources and Environmental Control – Site Investigation and Restoration Section (DNREC-SIRS) has received and reviewed the Remedial Investigation Work Plan for the 12<sup>th</sup> Street Drum Site portion of the Amtrak Former Fueling Facility, prepared by Stantec on behalf of the National Railroad Passenger Corporation (Amtrak) and American Premier Underwriters, Inc. (APU), and submitted on October 17, 2016. DNREC-SIRS provides the following comments:

- Please add two more soil boring locations to your planned investigation. One boring is requested between NS-3 and NS-4, and one is requested between NS-6 and HA02, based upon the locations depicted on Figure 6 of the draft workplan.
- As opposed to limiting the reporting of COCs to lead and arsenic (for TAL metals) and benzo(a)pyrene, benzo(a)anthracene and benzo(b)fluoranthene (for SVOCs), please report the full list of compounds in accordance with HSCA protocol. By doing so, data obtained from these samples will be consistent with that obtained from other portions of the Former Fueling Facility site.
- Although stated in the opening paragraph of the workplan, please add a section to the report about reporting, and indicate again that the information will be incorporated into the Remedial Investigation and Focused Feasibility Study of the Amtrak Former Fueling Facility site.

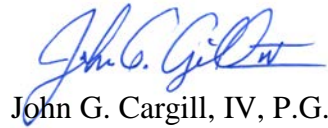
*Delaware's good nature depends on you !*

Steve Baggett  
November 2, 2016  
Page 2 of 2

Since the report was received as draft, please make corrections based upon the comments above, and resubmit as Final. DNREC-SIRS will provide a quick email approval so that site work can commence as soon as possible.

If you have any questions or comments, please don't hesitate to contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read "John G. Cargill, IV, P.G.", is positioned above the printed name.

John G. Cargill, IV, P.G.  
Project Manager

JGC:tlw  
JGC16062.doc  
DE 0266 II B 2

pc: Qazi Salahuddin, DNREC-SIRS Program Manager  
Tim Ratsep, DNREC-SIRS Program Administrator  
Rick Greene, DNREC-WAS